

BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
702.382.2101

KIRK B. LENHARD, ESQ., Nevada Bar No. 1437
EMILY A. ELLIS, ESQ., Nevada Bar No. 11956
BROWNSTEIN HYATT FARBER SCHRECK, LLP
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614
Telephone: 702.382.2101
Facsimile: 702.382.8135
Email: klenhard@bhfs.com
Email: nbaker@bhfs.com

DENNIS H. HRANITZKY, ESQ. (admitted *pro hac*)
DECHERT LLP
1095 Avenue of the Americas
New York, NY 10036-6797
Telephone: 212.698.3500
Facsimile: 212.698.3599
Email: dennis.hranitzky@dechert.com

LINDSEY B. COHAN, ESQ. (admitted *pro hac*)
DECHERT LLP
300 W. 6th Street, Suite 2010
Austin, TX 78731
Telephone: 512.394.3000
Facsimile: 512.394.3001
Email: lindsey.cohan@dechert.com

Attorneys for Plaintiff NML Capital Ltd.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

NML CAPITAL LTD.,

Plaintiff,

v.

THE REPUBLIC OF ARGENTINA,

Defendant.

CASE NO.: 2:14-cv-00492-RFB-VCF

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR NML
CAPITAL, LTD. TO FILE RESPONSE
TO M.F. CORPORATE SERVICES
(NEVADA) LTD.'S AND MOSSACK
FONSECA & CO.'S RESPONSE TO
MOTION FOR SANCTIONS (DKT. NOS.
265, 266)**

(FIRST REQUEST)

Plaintiff NML Capital, Ltd. ("NML"), by and through its attorneys of record, Kirk B. Lenhard, Esq. and Emily Ellis, Esq., of Brownstein Hyatt Farber Schreck, LLP, and Dennis H. Hranitzky, Esq. and Lindsey B. Cohan, of Dechert LLP; M.F. Corporate Services (Nevada) Ltd. ("MF Nevada"), by and through its attorneys of record, Kent P. Woods of Woods Erickson & Whitaker LLP; and Mossack Fonseca & Co. ("Mossack Fonseca"), by and through its attorneys

of record, Frank M. Flansburg, III, Esq., and Brian Blankenship, Esq., of Schwartz Flansburg PLLC, and Dennis M. Campbell, Esq., of Campbell Law Firm PLLC, hereby agree and stipulate, subject to the Court's approval, as follows:

1. NML filed its Motion for Sanctions on May 24, 2016.

2. MF Nevada and Mossack Fonseca filed their respective responses to the Motion for Sanctions on July 18, 2016.

3. NML's reply in support of its Motion for Sanctions is currently due on July 28, 2016.

4. Due to the need for NML to respond to two separate opposition briefs in its reply, as well as the current travel schedule for NML's lead counsel and associate over the coming weeks, NML requires additional time to adequately respond to MF Nevada and Mossack Fonseca's responses to the Motion for Sanctions.

5. Mr. Woods, on behalf of MF Nevada, and Mr. Campbell and Mr. Flansburg, on behalf of Mossack Fonseca, have agreed to extend the deadline for NML to file its reply in support of its Motion for Sanctions to fourteen (14) days, or up to August 11, 2016.

6. In light of the foregoing, the Parties submit that good cause exists for the Court to grant this Motion, and respectfully request that the Court extend the deadline for NML to file its reply in support of its Motion for Sanctions fourteen (14) days, or up to August 11, 2016.

DATED this 25th day of July, 2016.

WOODS ERICKSON & WHITAKER LLP

By: /s/ Kent P. Woods

Kent P. Woods, NV Bar 12306
1349 Galleria Drive # 200
Henderson, Nevada 89014

*Attorney for M.F. Corporate Services (Nevada)
Limited*

BROWNSTEIN HYATT FARBER
SCHRECK, LLP

By: /s/ Kirk B. Lenhard

Kirk B. Lenhard, Esq., NV Bar 1437
Emily A. Ellis, Esq., NV Bar 11956
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614

Dennis H. Hranitzky (admitted *pro hac*)
Dechert LLP
1095 Avenue of the Americas
New York, NY 10036-6797

SCHWARTZ FLANSBURG PLLC

By: /s/ Frank M. Flansburg, III
 Frank M. Flansburg III, Esq.
 Nevada Bar No. 6974
 Brian Blankenship, Esq.
 Nevada Bar No. 11522
 6623 Las Vegas Blvd. South, Suite 300
 Las Vegas, NV 89119

Dennis M. Campbell, Esq.
 (*pro hac* pending)
 Campbell Law Firm PLLC
 95 Merrick Way, Suite 514
 Coral Gables, FL 33134

Attorneys for Mossack Fonseca & Co.

Lindsey B. Cohan (admitted *pro hac*)
 Dechert LLP
 300 W. 6th Street, Suite 200
 Austin, TX 78731

Attorneys for Plaintiff NML Capital, Ltd.

IT IS SO ORDERED.

Dated this 11th day of August, 2016.



RICHARD F. BOULWARE, II
 UNITED STATES DISTRICT JUDGE

Respectfully submitted by:

BROWNSTEIN HYATT FARBER SCHRECK, LLP

/s/ Kirk B. Lenhard, Esq.
 Kirk B. Lenhard, Esq.
 Nevada Bar No. 1437
 Emily A. Ellis
 Nevada Bar No. 11956
 100 North City Parkway, Suite 1600
 Las Vegas, Nevada 89106
Attorneys for Plaintiff NML Capital, Ltd.

BROWNSTEIN HYATT FARBER SCHRECK, LLP
 100 North City Parkway, Suite 1600
 Las Vegas, NV 89106-4614
 702.382.2101